

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

	X	
In re SONY BMG CD TECHNOLOGIES LITIGATION	:	Civil Action No. 1:05-cv-09575-NRB
	:	
	:	<u>CLASS ACTION</u>
	:	
This Document Relates To:	:	DECLARATION OF ROBERT S. GREEN
	:	FILED ON BEHALF OF GREEN WELLING
	:	IN SUPPORT OF RICCIUTI GROUP'S
ALL ACTIONS.	:	MOTION FOR AWARD OF ATTORNEYS'
	:	FEES AND REIMBURSEMENT OF
	:	EXPENSES
	X	

I, Robert S. Green, declare as follows:

1. I am a partner in the firm of Green Welling LLP. I am submitting this declaration in support of my firm's application for an award of attorneys' fees in connection with services rendered in the above-entitled action and the reimbursement of expenses incurred by my firm in the course of this litigation.

2. This firm is counsel of record for plaintiffs Tom Ricciuti, Yvonne Ricciuti, Mary Schumacher, Robert Hull, Joseph Halpin, Edwin Bonner and Erin Melcon.

3. The identification and background of my firm and its partners is attached hereto as Exhibit A.

4. A detailed description of contemporaneous time records, including the date, hours expended and the nature of work done through March 10, 2006 is attached hereto as Exhibit B.

5. The total number of hours spent on this litigation by my firm through March 6, 2006 is 568.07, for which the total lodestar amount for attorney/paralegal time based on the firm's historical rates is \$213,311.83. The hourly rates shown below are the usual and customary rates

charged for each individual in all of our cases shown as a weighted average of the rates and hours available in 2005 and 2006. A breakdown of the lodestar is as follows:

**INCEPTION THROUGH MARCH 10, 2006**

NAME		HOURS	RATE	LODESTAR
Robert S. Green	P	296.70	501.10	148,676.00
Jenelle Welling	P	21.87	359.62	7,864.83
Elizabeth C. Guarnieri	A	18.20	300.00	5,460.00
Kamon D. Naddaf	A	19.00	275.00	5,225.00
Avin P. Sharma	A	183.40	227.67	41,755.00
Katie P. Brown	PL	.40	140.00	56.00
Guillaume Brasseur	PL	28.50	150.00	4,275.00
<b>TOTAL:</b>		<b>568.07</b>		<b>213,311.83</b>

(P) Partner

(A) Associate

(PL) Paralegal

(CA) Contract Attorney  
or (OC) Of Counsel

6. My firm incurred a total of \$14,181.17 in unreimbursed expenses in connection with the prosecution of this litigation. They are broken down as follows:

**EXPENSES**

From Inception to March 10, 2006

DISBURSEMENT	QUANTITY	PRICE	TOTAL
Meals, Hotels & Transportation			\$1,300.63
Photocopies	669 pages	\$.30	\$200.70
Postage	3	\$8.76	\$26.28
Facsimile	212 pages	\$1.00	\$212.00
Messenger, Overnight Delivery	88	\$164.37	\$741.48
Filing, Witness, Process Service and Other Fees			\$2,461.51
Lexis, Westlaw, Online Library Research			\$162.36
Class Action Notices/Business Wire	2	137.50	\$275.00
Experts/Consultants/Investigators			\$8,801.21
<b>TOTAL:</b>			<b>\$14,181.17</b>

7. The following is additional information regarding expenses for which we are asking for reimbursement:

(a) Filing, Witness, Process Service and Other Fees: \$2,461.51

<b>DATE</b>	<b>VENDOR</b>	<b>AMOUNT</b>
11/22/05	One Legal	\$1,006.56
11/23/05	One Legal	\$14.95
12/2/05	One Legal	\$49.50
12/1/05	One Legal	\$49.50
12/8/05	U.S. District Court	\$250.00
12/14/05	One Legal	\$45.25
12/15/05	One Legal	\$60.00
12/8/05	Spincycle	\$70.00
12/8/05	Spincycle	\$55.00
12/13/05	Stokes & Levin	\$211.95
12/13/05	One Legal	\$14.95
11/23/05	Stokes & Levin	\$211.95
11/23/05	Stokes & Levin	\$209.85
12/13/05	Stokes & Levin	\$211.95

(b) Meals, Hotels and Transportation: \$1,300.63. Expenses for meals, hotels and transportation were incurred for the following purposes:

<b>NAME</b>	<b>DATE</b>	<b>DESTINATION</b>	<b>PURPOSE</b>	<b>AMOUNT</b>
Robert S. Green	12/17-12/19/05	New York	Settlement Meeting	\$1,300.63

(c) Photocopying:

In-house (669 copies @ \$0.30 per copy): \$200.70

Outside Photocopying Expenses: \$0

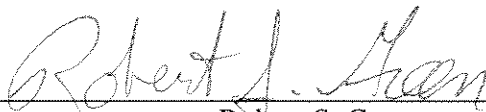
(d) Lexis, Westlaw, Online Library Research: \$162.36. These vendors included:

Disclosure, Inc., Dow Jones Interactive, Dow Jones & Co., Inc., Lexis Nexis, CDA Investment Technologies, Pacer Service Center, West Publishing Corporation, and Choice Point. These

databases were used to obtain access to Sony Corporation's SEC filings and to do media searches regarding Sony BMG. The charges for these vendors vary depending upon the type of services requested.

8. The expenses incurred pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed this 6th day of April, 2006, at San Francisco, California.

  
Robert S. Green